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16 Attorneys for WAYMO LLC

17 UNITED STATES DISTRICT COURT

18 NORTHERN DISTRICT OF CALIFORNIA, SAN FRANCISCO DIVISION

19 WAYMO LLC,

20 CASE NO. 3:17-cv-00939-WHA

21 Plaintiff,

22 **DECLARATION OF LINDSAY COOPER  
IN SUPPORT OF PLAINTIFF WAYMO  
LLC'S ADMINISTRATIVE MOTION TO  
FILE UNDER SEAL PORTIONS OF ITS  
REPLY IN SUPPORT OF ITS JUNE 15,  
2017 LETTER BRIEF REGARDING  
PRIVILEGE ISSUES**

23 vs.

24 UBER TECHNOLOGIES, INC.;  
25 OTTOMOTTO LLC; OTTO TRUCKING  
26 LLC,

27 Defendants.

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1 I, Lindsay Cooper, declare as follows:

2       1. I am an attorney licensed to practice in the State of California and am admitted to  
 3 practice before this Court. I am an associate at the law firm Quinn Emanuel Urquhart & Sullivan,  
 4 LLP, counsel for the Plaintiff Waymo LLC (“Waymo”). I have personal knowledge of the matters set  
 5 forth in this Declaration, and if called as a witness I would testify competently to those matters.

6       2. I make this declaration in support of Waymo’s Administrative Motion to File Under  
 7 Seal Portions of its Reply in Support of its June 15, 2017 Letter Brief Regarding Privilege Issues (the  
 8 “Administrative Motion”). The Administrative Motion seeks an order sealing the following materials:

Document	Portions to Be Filed Under Seal	Designating Party
Portions of Waymo’s Letter Brief	Portions highlighted in blue	Defendants
Exhibit 1 to the Declaration of Melissa Baily	Entire Documents	Defendants

13       3. Waymo has filed portions of its Letter Brief and Exhibit 1 to the Declaration of Melissa  
 14 Baily under seal because they contain information that Defendants have designated confidential.

15       4. Waymo expects Defendants to file one or more declarations in accordance with the  
 16 Local Rules.

18       I declare under penalty of perjury under the laws of the State of California and the United  
 19 States of America that the foregoing is true and correct, and that this declaration was executed in San  
 20 Francisco, California, on June 20, 2017.

22       By /s/ Lindsay Cooper

23                   Lindsay Cooper  
 24                   Attorney for WAYMO LLC

1                   **SIGNATURE ATTESTATION**

2                   Pursuant to Local Rule 5-1(i)(3), I attest under penalty of perjury that concurrence in the  
3 filing of this document has been obtained from Lindsay Cooper.

4                   */s/ Charles K. Verhoeven*  
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6                   Charles K. Verhoeven

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